

**MILMAN LABUDA LAW GROUP PLLC**

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September 3, 2024

**VIA ECF**

United States District Court Eastern District of New York  
Attn: Hon. Pamela K. Chen, U.S.D.J.  
225 Cadman Plaza East  
Courtroom 4F North  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, et al.**  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**  
**MLLG File No.: 25-2022**

Dear Judge Chen:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

Plaintiff respectfully submits this letter in compliance with this Court's July 29, 2024 Order directing Plaintiff to file a list of exhibits admitted during the May 29, 2024 and July 29, 2024 hearings, including exhibit numbers and a brief description of the document. The information contained herein is based on our notes and memory as we have not yet received the transcript from the July 29, 2024 hearing. In the event, after reviewing the transcript, we learn that any of this information is inaccurate or that there were additional exhibits admitted, we will inform the Court.

<b><u>5/29/2024</u></b>	
<b><u>Admitted</u></b>	
34	Text messages between Safa and Rosenblatt; Safa bribery; Safa instructing Rosenblatt to sabotage plaintiff's business
37	Safa recommending Accompanied Exams to Arnie Baum of Subin Associates email dated March 30, 2023
41	Invoice from Giant Partners to IME Companions and payments received from IME Companions (total \$43,500) last payment January 25, 2023
57	Safa from her GMAIL on April 12, 13, 2023 giving Giant Partners instructions on building IME Legal Reps
58	Safa from her GMAIL on April 14, 2023 giving Giant Partners instructions deactivating IME Companions and activating IME Legal Reps
64	Giant Partners emailing Safa and Eugene on June 1, 2023

67	Giant Partners emailing Safa on February 9, 2024, asking if she is still working with Eugene
68	Giant Partners emailing Safa on March 12 2024, asking if she settled things with "that lady"
82	Zelle payments from Safa to Adam Rosenblatt
86	Safa emailing Vito, check out a report
<b><u>7/29/2024</u></b>	
<b><u>Admitted</u></b>	
6	Screen shots of Defendant's current website
11	Marketing Materials
	<b>Although the below exhibits were not admitted into evidence, on page 12 of the May 29, 2024 transcript, the Court stated "I am going to look at all the exhibits you are putting before her [Safa], but many of them I am not going to admit as we have just discussed unless there is a legitimate basis to admit them."</b>
1	ECF 202-3, Declaration of Safa Gelardi April 27, 2023
2	Response to Subpoena, IME dated March 14, 2023, Sara Gonzalez of CES appears with Ginarte plaintiff
4	IME Report dated March 27, 2023 (date of OTSC hearing) Sara Gonzalez accompanied Ginarte plaintiff
11	Response to Subpoena, IME dated April 19, 2023, Fari Gutierrez accompanied Ginarte Plaintiff
12	IME Report dated April 19, 2023, Mark Purificati of IME Companions with Subin Plaintiff
29	IME Report dated April 7, 2023, Christian Hogarth of CES accompanied Subin Associates client (appears on Subin Invoice)
33	Email from Defense Counsel Warner portraying IME Companions is closed
39	Giant Partners email exchange between IMELEGALREPS@GMAIL.COM, with password: Levicunt62 for GoDaddy account of IME Legal Reps
40	Steve Stanulis declaration with exhibits, receipts of \$1500 Defendants paid him, and communication with Defendants (November 2022)
44	Letter from BRG (Forensics) dated September 7, 2023, outlining outstanding debt
45	Email exchange dates between 01/18/23 & 2/06/23, between Defendant Safa and Tiffany of Giant Partners, Safa gives IME Watchdog trade secret and customer list to Giant Partners

49	THEIMECOMPANY.COM webpage post
52	IME Companions, Safa, Vito and Liddie contract of sale April 10, 2023
53	IME Legal Reps domain purchase date April 10, 2023
54	This is Eugene Liddy email to Giant Partners
55	Email between IME Legal Reps, Safa, and address in TX
56	Email from Giant Partners, Safa credentials at IME LEGAL REPS
60	Giant Partners emails Safa gmail April 18, 2023, giving her an update on IME Legal Reps website
61	Safa gives credentials Safa1125 to Giant Partners
62	Giant Partners emailing Eugene on May 17, 2023, mentioning Safa and the Court Date
63	Giant Partners emailing Safa and Eugene on May 19, 2023
65	Giant Partners emailing Safa and Eugene on June 9, 2023
66	Safa from GMAIL, requesting marketing material from Giant Partners folder on June 21, 2023
69	Googlemets meeting accepted March 20, 2024
71	Giant Partners Hubspot emails
73	Bergman, Bergman declaration
85	Safa emailing Karl, Vito and Roman on 8-19-17

Dated: Lake Success, New York  
September 3, 2024

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York  
September 3, 2024

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)